

GIBSON, DUNN & CRUTCHER LLP  
Adam H. Offenhartz  
Matthew J. Williams  
Aric H. Wu  
Lisa H. Rubin  
200 Park Avenue  
New York, New York 10166  
Telephone: (212) 351-4000

AKIN GUMP STRAUSS HAUSER & FELD LLP  
Daniel H. Golden  
Deborah J. Newman  
Naomi Moss  
One Bryant Park  
New York, New York 10036  
Telephone: (212) 872-1000

*Attorneys for the Participating Unitholders*

*Attorneys for Wilmington Trust Company,  
as Trustee for and Administrator of the  
Motors Liquidation Company GUC Trust*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re:**

**MOTORS LIQUIDATION COMPANY, *et al.*,  
f/k/a General Motors Corp., *et al.*,**

**Debtors.**

Chapter 11

Case No. 09-50026 (REG)

(Jointly Administered)

**NOTICE OF CROSS-APPEAL**

Notice is hereby given that Wilmington Trust Company, as trustee for and trust administrator of the Motors Liquidation Company GUC Trust (the “GUC Trust”), and certain participating GUC Trust unitholders (the “Unitholders”) hereby cross-appeal under 28 U.S.C. § 158(d)(2) and Rules 8002(a)(3) and 8006(e) of the Federal Rules of Bankruptcy Procedure to the United States Court of Appeals for the Second Circuit from the judgment entered in this action on June 1, 2015 (ECF No. 13177) (the “Judgment”) and the Decision on Motion to Enforce Sale Order entered in this action on April 15, 2015 (ECF No. 13109) (the “Decision”) pursuant to the Order, Pursuant to 28 U.S.C. § 158(d), and Fed. R. Bankr. P. 8006(e), Certifying Judgment for Direct Appeal to the Second Circuit entered in this action on June 1, 2015 (ECF No. 13178) (the “Certification”). Alternatively, to the extent that the United States Court of Appeals for the

Second Circuit does not authorize this cross-appeal, the GUC Trust and the Unitholders hereby cross-appeal the Judgment and the Decision to the United States District Court for the Southern District of New York.

A copy of the Judgment is annexed hereto as Exhibit 1, a copy of the Decision is annexed hereto as Exhibit 2, and a copy of the Certification is annexed hereto as Exhibit 3.

The parties to the Judgment and the Decision, and the names, addresses, and telephone numbers of their respective attorneys are:

Party	Attorneys
The GUC Trust	<b>GIBSON, DUNN &amp; CRUTCHER LLP</b> Adam H. Offenhartz Matthew J. Williams Aric H. Wu Lisa H. Rubin 200 Park Avenue New York, NY 10166 Telephone: 212-351-4000 Email: aoffenhartz@gibsondunn.com Email: mjwilliams@gibsondunn.com Email: awu@gibsondunn.com Email: lrubin@gibsondunn.com
The Unitholders	<b>AKIN GUMP STRAUSS HAUER &amp; FELD LLP</b> Daniel H. Golden Deborah J. Newman Naomi Moss One Bryant Park New York, New York 10036 Telephone: (212) 872-1000 Email: dgolden@akingump.com Email: dnewman@akingump.com Email: nmoss@akingump.com
General Motors LLC	<b>KING &amp; SPALDING LLP</b> Arthur J. Steinberg Scott I. Davidson 1185 Avenue of the Americas New York, NY 10036 Telephone: 212-556-2100 Email: asteinberg@kslaw.com Email: sdavidson@kslaw.com

Party	Attorneys
	<b>KIRKLAND &amp; ELLIS LLP</b> Richard C. Godfrey Andrew B. Bloomer 300 North LaSalle Chicago, IL 60654 Telephone: 312-862-2000 Email: rgodfrey@kirkland.com Email: abloomer@kirkland.com
<i>Groman</i> Plaintiffs	<b>GOLDENBOCK, EISEMAN, ASSOR, BELL &amp; PESKOE, LLP</b> Jonathan L. Flaxer S. Preston Ricardo 437 Madison Avenue New York, NY 10022 Telephone: 212-907-7300 Email: jflaxer@golenbock.com Email: pricardo@golenbock.com
<i>Elliott and Sesay</i> Plaintiffs	Gary Peller 600 New Jersey Avenue, NW Washington, D.C. 20001 Telephone: 202-662-9122 Email: peller@law.georgetown.edu
Ignition Switch Pre-Closing Accident Plaintiffs	<b>GOODWIN PROCTER LLP</b> William P. Weintraub Gregory W. Fox The New York Times Building 620 Eighth Avenue New York, NY 10018 Telephone: 212-813-8800 Email: wwaintraub@goodwinprocter.com Email: gfox@goodwinprocter.com
Ignition Switch Plaintiffs	<b>BROWN RUDNICK LLP</b> Edward S. Weisfelner David J. Molton May Orenstein Howard S. Steel Seven Times Square New York, NY 10036 Telephone: 212-209-4800 Email: eweiselner@brownrudnick.com Email: dmolton@brownrudnick.com Email: morenstein@brownrudnick.com Email: hsteel@brownrudnick.com

Party	Attorneys
	<b>STUTZMAN, BROMBERG, ESSERMAN &amp; PLIFKA, P.C.</b> Sander L. Esserman 2323 Bryan Street, Suite 2200 Dallas, TX 75201 Telephone: 214-969-4900 Email: esserman@sbep-law.com

Dated: New York, New York  
June 15, 2015

Respectfully submitted,

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Aric H. Wu  
Adam H. Offenhartz  
Matthew J. Williams  
Aric H. Wu  
Lisa H. Rubin

200 Park Avenue  
New York, New York 10166  
Telephone: (212) 351-4000  
Facsimile: (212) 351-4035

*Attorneys for Wilmington Trust Company,  
as Trustee for and Administrator of the  
Motors Liquidation Company General  
Unsecured Creditors Trust*

AKIN GUMP STRAUSS HAUER & FELD LLP

By: /s/ Daniel H. Golden  
Daniel H. Golden  
Deborah J. Newman  
Naomi Moss

One Bryant Park  
New York, New York 10036  
Telephone: (212) 872-1000  
Facsimile: (212) 872-1002

*Attorneys for Participating Unitholders*